

Brewer Deposition Day 2

EXHIBIT B

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

ALBERT BREWER, : NO. 13-CV-05763
Plaintiff :

vs. :

BERKS COUNTY SHERIFF, ERIC J. :
WEAKNECHT, SHERIFF; ANTHONY :
DEMORE, CHIEF; VINCENT :
PACIFICO, SERGEANT, :

Defendants :

DEPOSITION OF ALBERT BREWER
VOLUME II

Taken in the Berks Heim Nursing and
Rehabilitation, 1011 Berk Road, Essick's Conference
Room, Leesport, Pennsylvania, on Tuesday, June 2,
2015, commencing at 1:24 p.m., before Suzanne L. E.
Toto, Registered Professional Reporter.

APPEARANCES:

STEPHEN V. YARNELL, ESQ.
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-- For The Plaintiff

* * *

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<p style="text-align: right;">Page 23</p> <p>1 APPEARANCES: (CONTINUED)</p> <p>2 DEASEY MAHONEY & VALENTINI LTD.</p> <p>3 BY: ANDREW B. ADAIR, ESQUIRE</p> <p>4 103 Chesley Drive</p> <p>5 Lafayette Building, Suite 101</p> <p>6 Media, PA 19063</p> <p>7 -- For The Defendants</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23 * * *</p> <p>24 VERITEXT LEGAL SOLUTIONS</p> <p>25 MID-ATLANTIC REGION</p> <p>4949 Liberty Lane, Suite 200</p> <p>Allentown, PA 18106</p>	<p style="text-align: right;">Page 25</p> <p>1 261:24</p> <p>2</p> <p>3 19</p> <p>4</p> <p>5 20</p> <p>6</p> <p>7 21</p> <p>8</p> <p>9 22</p> <p>10</p> <p>11 23</p> <p>12</p> <p>13 24</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 24</p> <p>1 1 INDEX</p> <p>2 2 WITNESSES</p> <p>3 3 ALL WITNESSES: PAGE:</p> <p>4 4 ALBERT BREWER:</p> <p>5 5 Examination by MR. ADAIR</p> <p>6 6 EXHIBITS</p> <p>7 7 NO.: DESCRIPTION: PAGE:</p> <p>8 8 Brewer 16</p> <p>9 Statement of Angel Cabrera:</p> <p>10 9</p> <p>11 For Identification</p> <p>12 231:9</p> <p>13 10 Brewer 17</p> <p>14 11 Statement of Leslie Cruz:</p> <p>15 12 For Identification</p> <p>16 253:10</p> <p>17 13 Brewer 18</p> <p>18 14 EEO Seminar Outline:</p> <p>19 15 For Identification</p> <p>20 256:21</p> <p>21 16 Brewer 19</p> <p>22 17 Goal Setting Outline:</p> <p>23 18 For Identification</p> <p>24 258:10</p> <p>25 19 Brewer 20</p> <p>Certification of Health Care Provider</p> <p>for Berks County</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 228</p> <p>1 (It is stipulated by and between</p> <p>2 counsel for the respective parties that the reading,</p> <p>3 signing and sealing of the deposition is waived, and</p> <p>4 that all objections except as to the form of the</p> <p>5 question are reserved until the time of the trial.)</p> <p>6 * * *</p> <p>7 ALBERT BREWER, having been</p> <p>8 previously sworn, was examined and testified as</p> <p>9 follows:</p> <p>10 * * *</p> <p>11 EXAMINATION (continued)</p> <p>12 BY MR. ADAIR:</p> <p>13 Q. Mr. Brewer, do you remember the</p> <p>14 instructions that I gave you for the first time that</p> <p>15 we went through this --</p> <p>16 A. Yes, I did.</p> <p>17 Q. -- the other day? And you understand</p> <p>18 that you are still under oath today?</p> <p>19 A. No problem.</p> <p>20 Q. With that being said, we are going to</p> <p>21 pick up where we left off. For the most part I'm not</p> <p>22 trying to explore old ground, and I apologize if</p> <p>23 there is maybe a thing or two that I touch on that I</p> <p>24 either don't remember, but that's not my intention to</p> <p>25 talk about what we already discussed.</p>

2 (Pages 23, 24, 25, 228)

<p style="text-align: right;">Page 229</p> <p>1 What I would like to do -- and I am 2 going to give you this for your reference, was an 3 exhibit that we had previously marked as Brewer 1. 4 And if you look on the second page, the first 5 paragraph -- do you have a copy? 6 MR. YARNELL: I don't have mine. 7 MR. ADAIR: I have mine. I'm sorry, I 8 don't have another copy. 9 MR. YARNELL: Page 2? 10 MR. ADAIR: Page 2, the first 11 question. 12 BY MR. ADAIR: 13 Q. And I will tell you what I am going to do. 14 The question generally asks you to identify all the 15 witnesses that you expect -- who may testify in the 16 trial of this case. I just -- I am going to ask you 17 each of these individuals, and I am going to ask you 18 what you believe they will testify to. 19 So we will just go through them one by 20 one, okay? 21 A. Okay. 22 Q. The first person that you have identified 23 as a potential witness is Detective Ivan Martinez? 24 A. Martinez. 25 Q. Martinez, okay. You have identified him</p>	<p style="text-align: right;">Page 231</p> <p>1 shake hands and embrace me, he didn't like that at 2 all. 3 Q. Pacifico didn't like that? 4 A. No, Pacifico didn't like that at all. He 5 got in a statement over that. 6 Q. I have an exhibit that we will mark -- 7 and I'm not sure which we are up to. 8 MR. YARNELL: It's 16. 9 (Brewer Exhibit Number 16 was marked 10 for identification.) 11 (Discussion held off the record.) 12 BY MR. ADAIR: 13 Q. Mr. Brewer, a minute ago you mentioned 14 that there was a statement that Mr. Cabrera had made. 15 Is that the statement? 16 A. Yes. 17 Q. And is this something that he typed up 18 himself or is it something that you typed up and 19 asked him whether it was correct? 20 A. No. He type it up and email it over to 21 me. And then we met each other, and he gave me the 22 original one signed. 23 Q. Okay. Tell me what happened during this 24 incident in your words. Where were you? 25 A. I was on the first floor in the</p>
<p style="text-align: right;">Page 230</p> <p>1 as a potential witness. What do you believe that he 2 would testify to, if called as a witness at trial? 3 A. Well, he will testify that I turned the 4 prisoner over to him and he find me right at the door 5 of the conference room because I was waiting for him. 6 Q. Okay. And when was the last time that 7 you spoke with Mr. Martinez? 8 A. Long ago. I don't quite remember, but it 9 was like -- the last time that I talked to him was 10 probably when I was fired, when I was terminated from 11 my job. 12 Q. And what did you discuss? 13 A. I ask him if no one ask him for his 14 statement in the investigation. And he said, nobody 15 talks to me about it. That was the -- as far as I 16 remember what I talk to him. 17 Q. Okay. The second person listed is 18 Detective Angel Cabrera. Do you know who employs 19 Detective Angel Cabrera currently? 20 A. Not right now I don't know. 21 Q. And what do you expect that Detective 22 Cabrera would testify to? 23 A. One of the incident that how Pacifico 24 treated me before. And the way that he -- his 25 demeanor when Angel Cabrera went to say hi to me and</p>	<p style="text-align: right;">Page 232</p> <p>1 arraignment court, I believe it was. I don't 2 remember the date or the time or anything like that. 3 I just was stand by the Judge doing my duties as a 4 deputy sheriff. And then Angel Cabrera, i believe he 5 had -- he was active at that time. He got a case 6 going on or I don't know if he was a witness. I 7 don't remember the details. 8 But he just came over to me, shake 9 hands and embrace me, hey, how you doing, brother; 10 how's everything going; just fine, you know regular 11 reading, speaking, and all that. And then Pacifico 12 came over, and he didn't actually touch us or 13 anything. 14 But he told me, come over here. And 15 like he was mad or something. That don't look 16 professional what you and Angel doing, this, this and 17 that, Detective Cabrera doing. I said, we haven't 18 done anything wrong. That's the way that we are. 19 That's who we are. Well, I didn't like that. That 20 doesn't look professional. 21 And then I believe Angel Cabrera heard 22 a few words of what he says. And then he said, this 23 guy is an asshole. And the Judge that we were -- 24 that I was guarding, I don't remember if it was 25 Xavios or -- I don't remember who it was, the Judge.</p>

3 (Pages 229 - 232)

<p style="text-align: right;">Page 233</p> <p>1 But when he -- when Angel Cabrera says, this guy is 2 an asshole, the Judge say, yes, he is. And that's 3 what I remember about that. 4 And I told him when we start all of 5 this, I told Angel, do you remember the incident that 6 happened in the court and this and that. And he told 7 me, yes, I am going to write it up because this is 8 what I remember that happen. And he write it up, and 9 he signed it. 10 Q. In this statement here, I notice that 11 Mr. Cabrera did not make any reference about Sergeant 12 Pacifico saying anything about you guys being 13 Hispanic. 14 Did Sergeant Pacifico say anything 15 about you gentlemen being Hispanic? 16 A. No, he didn't say anything about being 17 Hispanic or his demeanor. He didn't like what we did 18 like embracing and saluting each other. That's the 19 way we are. It could be in the White House and 20 nobody is going to change that. 21 Q. And why did you take that as a reference 22 to Pacifico not liking Hispanics? 23 A. Well, because I seen other detectives 24 saying hi to other deputies, not the same way; and he 25 never said anything about it. I seen police officers</p>	<p style="text-align: right;">Page 235</p> <p>1 reflect that Mr. Yarnell made a correction on the 2 form correcting Detective Joseph Garipoli to -- 3 MR. YARNELL: Deputy. 4 MR. ADAIR: -- Deputy. 5 MR. YARNELL: And that is correct. 6 MR. ADAIR: It's not a big deal just 7 so the record reflects it. 8 MR. YARNELL: I get it. 9 BY MR. ADAIR: 10 Q. I'm sorry, the question was, what would 11 you expect Deputy Garipoli to testify to? 12 A. I can't get into detail because I 13 don't -- I don't really remember. But he can be a 14 witness of the way he talk to basically to Hispanics, 15 the way that he talk to Doris Natel, the way he 16 talked to me in front of him. The way that he 17 treated me. 18 Q. And do you believe that he would also 19 testify that -- 20 A. Unless, unless he is afraid of losing his 21 job with the County. 22 Q. That's your opinion, correct? 23 A. Hum? 24 Q. That's your opinion, correct? 25 A. No.</p>
<p style="text-align: right;">Page 234</p> <p>1 shaking hands with deputy sheriffs, and I saw him 2 there myself. And I never seen him saying anything 3 to none of them. 4 Q. Do you ever see Mr. Pacifico in the 5 presence when two men embrace each other to say hi 6 other than this incident? 7 A. Other than this incident, no. 8 Q. Okay. You can put that aside. Let's 9 move on to the third one, Detective Joseph Garipoli. 10 A. Actually, it's Deputy Joseph Garipoli. 11 Q. And what would you expect him to testify 12 to? 13 A. I can really tell you specifically what 14 he -- 15 Q. Actually, hang on. Is that the exhibit 16 copy? 17 MR. YARNELL: Oh, shit, yes, sorry. 18 MR. ADAIR: That's okay. If you would 19 just put your initials next to it to indicate -- 20 MR. YARNELL: Sorry. 21 MR. ADAIR: That's okay. That's all 22 right. 23 BY MR. ADAIR: 24 Q. I'm sorry, what is it that you would 25 expect -- just for the record, just let the record</p>	<p style="text-align: right;">Page 236</p> <p>1 Q. He told you that he was afraid of losing 2 his job? 3 A. No, he didn't tell me but he ask me not 4 to put him in that spot because he feel afraid of it. 5 He didn't tell me verbally but his demeanor tell me 6 that he feel afraid of that. 7 Q. And do you believe that Mr. -- or 8 detective -- Deputy Garipoli would also testify that 9 Mr. Pacifico was also hostile towards nonHispanics? 10 A. Could be. It's a big possibility because 11 no one likes him in the department any ways. 12 Q. In your experience, did you ever observe 13 Mr. Pacifico being -- treating nonHispanics in a rude 14 manner? 15 A. Right now, right now, I don't recall and 16 I don't remember right now; but it could be the case. 17 I wouldn't doubt it at all. 18 Q. Okay. But as we sit here today, you 19 don't know what he would testify to other than what 20 you just said, would that be an accurate statement? 21 MR. YARNELL: You mean Garipoli? 22 MR. ADAIR: Garipoli, correct. 23 A. No, I wouldn't know what he would testify 24 specifically; but he could testify about what I told 25 you right now about his behavior.</p>

<p style="text-align: right;">Page 237</p> <p>1 Q. Okay. And then I believe we have already 2 spoken about Deputy Elvin Ortiz. What do you -- what 3 do you believe that Deputy Ortiz would testify to? 4 MR. YARNELL: Can we pause for a 5 minute? I have also marked out the word detective 6 here and will also put -- put my initials next to it. 7 It is the same circumstance as with the prior mark. 8 MR. ADAIR: Certainly. 9 A. Another thing, after Elvin Ortiz, it's 10 not Detective Issac Santiago or Detective, they all 11 deputies. I don't know for what reason they were 12 marking detective. The only detective that we can -- 13 that we have in this list is Detective Ivan Martinez 14 and Detective Angel Cabrera. 15 MR. YARNELL: I know the real reason. 16 The reason is because I made a mistake. I wrote down 17 detective instead of deputy. That's all the 18 difference. 19 MR. ADAIR: That's fine. I don't 20 think that impacts anything. 21 MR. YARNELL: I feel very blessed that 22 you feel that way. 23 BY MR. ADAIR: 24 Q. In any event, what is it that you believe 25 that Deputy Ortiz would testify to?</p>	<p style="text-align: right;">Page 239</p> <p>1 A. Not specific, but I know that he can be a 2 witness. 3 Q. Did Deputy Fox ever tell you that Deputy 4 Fox believed that Vince Pacifico was targeting him? 5 A. I don't remember. 6 Q. Did you ever see Vince Pacifico treat 7 Deputy Fox in a manner that you thought was harsh? 8 A. I'm thinking because I want to give you 9 the accurate answer that I can, but so far right now 10 I don't remember. 11 Q. When was the last time that you talked to 12 Deputy Fox? 13 A. I don't quite remember, but it was long 14 ago. It was a little more than a year or something 15 like that. I'm not sure. I just find them by 16 coincidence by the gym I go to. I just saw him, and 17 he was working out; hey, how you doing. That was 18 basically it. I didn't get into a conversation 19 because he was working out. And then when he left, 20 was working out. So he just say, hey, I see you 21 soon; I see you later; something like that. That was 22 about it. We couldn't talk to each other, have like 23 a conversation. 24 Q. Did you ever have a conversation with him 25 about testifying in this case?</p>
<p style="text-align: right;">Page 238</p> <p>1 A. Well, the times Pacifico threaten with -- 2 he put a target on his back, the way that he -- that 3 he threaten him, too, when he was subject of 4 investigation when he say if he doesn't cooperate and 5 a few other things that I don't recall right now. 6 Because all of this has been a little bit confused 7 for me. But he can testify the way that Pacifico 8 treat especially Hispanic deputies. 9 MR. YARNELL: Can I ask a favor? I 10 just got a text that relates to my -- 11 MR. ADAIR: Let's go off the record. 12 MR. YARNELL: I will need to go. 13 MR. ADAIR: That's fine. 14 (Discussion held off the record.) 15 BY MR. ADAIR: 16 Q. The next few that I think we have talked 17 about several times. I am going to skip down to 18 Number 8, Deputy Peter Fox. What do you expect 19 Deputy Fox would testify to? 20 A. He is another witness of the way that he 21 treat -- the way that he treated me and the way he 22 treated Santiago also and the way that he talk to 23 Doris Natel. 24 Q. Do you know any incidents that Deputy Fox 25 witnessed?</p>	<p style="text-align: right;">Page 240</p> <p>1 A. No, no, not that I remember. I haven't 2 talked to him about that. 3 Q. How about Deputy Gravish? 4 A. I haven't talked to him since I got 5 terminated from the sheriff department, probably 6 before that. He is another witness the way that 7 Pacifico treat Hispanics. 8 Q. How about did deputy -- did you ever 9 witness deputy -- strike that. 10 Did you ever witness Vince Pacifico 11 treat Deputy Gravish in a way that you thought was 12 unfair? 13 A. Not as far as I remember. I don't 14 remember right now. 15 Q. Are there any particular incidents that 16 you believe Deputy Gravish observed where Vince 17 Pacifico treated Hispanics in a manner that you 18 believe unfair? 19 A. Not a particular one, but I believe he 20 can testify to his behavior towards Hispanic 21 deputies. 22 Q. How about Deputy Ely? He is listed as a 23 witness. What do you believe that he would testify 24 to? 25 A. I don't know if he remember, but I do</p>

<p style="text-align: right;">Page 241</p> <p>1 remember. I was in control room receiving my orders 2 to go -- or I went to pick somebody up and let them 3 know that I was going to pick somebody up. And 4 Pacifico started up with the jokes about the hair. 5 He told me to take off my hat. And oh, that's your 6 hair, never mind; and he walk out of the control 7 room. And Terry Ely was there at the time; and he 8 look at me, what's wrong with this guy. And then he 9 walk away like disappointed or something that he 10 didn't like that comment or something and he walk 11 away. That was the only incident that I remember 12 about Terry Ely. He was in the warrant division at 13 that time. 14 Q. Was deputy or is Deputy Ely a Hispanic? 15 A. No. 16 Q. Do you have any knowledge as to whether 17 Vince Pacifico treated Deputy Ely in a manner that 18 was unfair? 19 A. No, not that I know of. 20 Q. When Vince Pacifico made that comment 21 about your hair, did you tell Vince Pacifico that 22 that bothered you that he made that joke? 23 A. At that time, I didn't tell him anything; 24 but he should have known because I don't -- the way 25 that I feel and the way that I am is if I don't joke</p>	<p style="text-align: right;">Page 243</p> <p>1 told you before, I didn't trust anybody; and I didn't 2 want to get into details. 3 Q. But you didn't mention to Captain Barrios 4 anything about Pacifico being a racist, correct? 5 A. As far as I remember, I don't think I 6 did. I'm not sure if I did or not or maybe my 7 demeanor told him that when I was talking to him 8 about that. 9 Q. How would your demeanor tell him? 10 A. Well, when I was talking to him about the 11 signing paperwork to go to that kind -- I don't 12 remember what kind of tactical school it was to 13 become one of the warrant division deputies, he told 14 me that your immediate supervisor got to sign it. 15 And I told him, Pacifico is not going to sign it. He 16 is not going to do anything for me and you know that 17 he is even targeting me right now. 18 Q. I hear what you are saying, but there's a 19 difference between saying that Pacifico won't sign it 20 and there's a difference between saying that and 21 saying Pacifico won't sign it because I'm Hispanic. 22 Would you agree with that? 23 A. No, I didn't say that he not going to 24 sign it because I'm Hispanic. I didn't say that. 25 But that's obviously why he wouldn't do it.</p>
<p style="text-align: right;">Page 242</p> <p>1 around with you, why should you joke around with me. 2 And then he is a sergeant. I don't want to get into 3 an argument. I'm already being targeted by him, so I 4 didn't say anything at that time. Honestly, I never 5 say anything to him about the joke. 6 Q. Did you ever go to any other management 7 level officials, either a sergeant or above, and 8 complain about that you believe that Vince Pacifico 9 was targeting Hispanics? 10 A. I never made an official complaint. 11 Q. Why didn't you go to one of the -- to a 12 ranking officer and say that you thought that 13 Pacifico was racist? 14 A. I didn't know who to trust at that time 15 to be honest with you. 16 Q. What about Captain Barrios? 17 A. I made a comment to him when he ask me if 18 I want to be in the warrant division. But I got to 19 go to certain school or something. And he told me 20 that sergeant got to sign it. I told him, forget 21 about it, he is not going to sign it. Pacifico not 22 going to sign anything for me, he not going to do 23 anything for me and you know it. That's the only 24 comment that I have and the only thing that I told 25 Captain Barrios because I didn't want to be -- like I</p>	<p style="text-align: right;">Page 244</p> <p>1 Q. Why do you believe that Captain Barrios 2 would have understood that it was obviously a 3 reference to Pacifico disliking Hispanics? 4 A. Well, the way that I talk to him and let 5 him know that Pacifico was not going to sign that 6 paperwork, the application for me to go to tactical 7 school. 8 Q. It's your belief that Captain Barrios 9 should have interpreted everything you said as 10 Pacifico was a racist even though you never used the 11 term race or Hispanic, correct? 12 A. That was too obvious. I didn't get into 13 it like I told you before and I will tell you many 14 times, I didn't trust anybody at that time. 15 Q. How about Deputy Perry Taglienti? 16 A. He was a new guy right before I got 17 terminated. And he was always asking me questions 18 about how can we do this, how the work and I told him 19 as far as I knew and as far as I was assigned to the 20 different jobs that I did, how he was. 21 Basically, I was his unofficial field 22 training officer because I don't know for what, why 23 he would have always come to me and ask me questions. 24 And he was getting along with me very good and 25 everything. And he -- I don't know, he felt</p>

6 (Pages 241 - 244)

<p style="text-align: right;">Page 245</p> <p>1 confidence talking to me, I don't know why. I always 2 help him out. I was always -- and he saw Pacifico a 3 few times -- oh, wait, getting mad at me when I used 4 to talk in Italian with -- I don't remember his name 5 right now. One of the deputies that I talk -- now 6 that I talk, I exchange words in Italian with Deputy 7 Martello and Deputy -- I don't remember their names. 8 He could be a witness of that. 9 Perry Taglienti, when he saw me 10 exchanging words in Italian with other deputies and 11 he told me, how many fucking languages do you know. 12 He was like I did something wrong, like I steal his 13 wife or something the way he talk to me like that. 14 And I told many times Perry Taglienti, hey, it's not 15 my fault that I'm not white. And he took it as a 16 joke. 17 And I told Perry, I'm not joking. He 18 is treating me that way because I'm not white, 19 because he never said anything to one of the Italian 20 decedent deputies. He just told me. 21 Q. Let me stop you because you just said 22 something that I didn't understand. You said a 23 minute ago that -- something about he said it to me 24 because I'm not white. Did you say that to Pacifico? 25 A. No. I say that to Perry Taglienti</p>	<p style="text-align: right;">Page 247</p> <p>1 MR. ADAIR: Was he treated by 2 Dr. Minnich at those hospitals? 3 MR. YARNELL: No. I understand your 4 question was that, but you just said are those all 5 the medical records we have. There may be others, 6 but we don't have them. 7 MR. ADAIR: Okay. In that same 8 exhibit -- 9 MR. YARNELL: Which page? 10 MR. ADAIR: Hang on for a second. If 11 you will turn to page 7 and 8, it's question 12. 12 MR. YARNELL: Okay. Read this. 13 BY MR. ADAIR: 14 Q. I can simplify things, but when you are 15 done reading just let me know. I can simplify it. 16 The question that was asked of you in discovery was 17 asking you -- and I am going to paraphrase to 18 identify the individuals who complained verbally 19 about discrimination to the Berks County Sheriff or 20 the Berks County Department of Human Resources. 21 In response to that question, you 22 answered the bottom of page 7 and the top of page 8, 23 you identified a couple of individuals. And what I 24 am going to do is I'm going to ask you the details 25 about who these individuals complained to.</p>
<p style="text-align: right;">Page 246</p> <p>1 because he ask me, why is he that way with you. I 2 told him, because I'm not white. 3 Q. Was Pacifico present when that was said? 4 A. No, he turn his back. He just let his 5 anger out. And when he turn back, I was talking to 6 Perry Taglienti about that. 7 Q. Was Pacifico in the area when you said to 8 Perry Taglienti that he is saying that to me because 9 I'm not white? 10 A. I don't know if he heard me or anything, 11 and I hope he did. He just walk away. 12 Q. The last person listed is Dr. Ryan 13 Minnich. Do you have any medical records from 14 Dr. Minnich? 15 MR. YARNELL: I think we provided 16 whatever medical records we had. 17 A. Whatever I have, I turn that over to my 18 attorney. 19 MR. ADAIR: For the record, I have a 20 one-page letter from Dr. Minnich and that's the only 21 medical records that I have. 22 MR. YARNELL: I think that is it that 23 we have. Now, if you -- he was treated at the 24 Reading Hospital and at St. Joseph's Hospital, 25 obviously they will have records.</p>	<p style="text-align: right;">Page 248</p> <p>1 A. So far -- as far as -- 2 Q. Let me ask you a question. 3 A. Go ahead. 4 Q. Who did Issac Santiago complain to about 5 discrimination? 6 A. If I'm not mistaken, human resources and 7 then he made a complaint to the -- 8 MR. YARNELL: Last time you said the 9 Pennsylvania Human Relations Commission. 10 A. There you go. I didn't remember the 11 name. 12 Q. Were you present when that complaint was 13 made -- when either complaint was made? 14 A. No. He told me about it. 15 Q. He told you about it. Do you know 16 whether Issac Santiago specifically complained that 17 Vince Pacifico treated him -- discriminated against 18 him on the basis of his race or nationality? 19 A. Yes. 20 Q. How about Doris Natel, who did she 21 complain about discrimination to? 22 A. I think that she made a complaint to the 23 human resources. I'm not sure. 24 Q. Did she tell you that she complained to 25 human relations --</p>

7 (Pages 245 - 248)

<p style="text-align: right;">Page 249</p> <p>1 A. No, she never told me about that.</p> <p>2 Q. Let me ask my whole question, just so</p> <p>3 everything is clear.</p> <p>4 You believe that she complained, but</p> <p>5 she didn't tell you that she did?</p> <p>6 A. As far as I remember, no, there's too</p> <p>7 many details that I don't remember. She would have</p> <p>8 told me or she -- maybe she didn't. I don't know. I</p> <p>9 don't remember.</p> <p>10 Q. Did she complain to the sheriff?</p> <p>11 A. Not that I know of.</p> <p>12 Q. How about Issac Santiago, did he complain</p> <p>13 to the sheriff?</p> <p>14 A. To the sheriff himself?</p> <p>15 Q. Yes.</p> <p>16 A. I don't know.</p> <p>17 Q. How about Madeline Gregory, did she</p> <p>18 complain to either human resources or the sheriff</p> <p>19 about discrimination, to your knowledge?</p> <p>20 A. No, not that I know of. She was a victim</p> <p>21 of Pacifico, but I don't know if she made a complaint</p> <p>22 or not. I don't remember that.</p> <p>23 Q. How about Jose Davila, did he complain to</p> <p>24 the sheriff or human resources about discrimination?</p> <p>25 A. I don't know about him.</p>	<p style="text-align: right;">Page 251</p> <p>1 they know that they were like specifically Pacifico</p> <p>2 and Chief DeMore at that time, he was -- Pacifico, he</p> <p>3 was a big brown noser to the chief all the time</p> <p>4 talking to him over the years and hugging him and</p> <p>5 having a type of confidence that everybody saw. So</p> <p>6 that's a conduct of friends.</p> <p>7 Q. Do you know if they hung out together</p> <p>8 after work?</p> <p>9 A. I wouldn't know that.</p> <p>10 Q. Did you ever hear a rumor that they</p> <p>11 associated with each other after work?</p> <p>12 A. I wouldn't know that, and I don't care to</p> <p>13 be honest with you.</p> <p>14 Q. Did you ever -- is it accurate for me to</p> <p>15 say that you never observed the sheriff's wife and</p> <p>16 Vince Pacifico together?</p> <p>17 A. No, no.</p> <p>18 Q. It's not accurate or you did see them</p> <p>19 together?</p> <p>20 A. No, I never seen them together.</p> <p>21 Q. It was a poorly phrased question on my</p> <p>22 part.</p> <p>23 A. No problem.</p> <p>24 Q. Do you have any knowledge of whether</p> <p>25 anyone ever told Chief DeMore that Vince Pacifico was</p>
<p style="text-align: right;">Page 250</p> <p>1 Q. And how about Elvin Ortiz, did Elvin</p> <p>2 Ortiz complain about discrimination to the sheriff or</p> <p>3 to human resources?</p> <p>4 A. As far as I know, the only thing that he</p> <p>5 did was told Pacifico that if he doesn't stop</p> <p>6 bothering him and harassing him, he was going to talk</p> <p>7 to his lawyer.</p> <p>8 Q. And that was something that you learned</p> <p>9 about after you were terminated from Berks County,</p> <p>10 correct?</p> <p>11 A. Yes.</p> <p>12 Q. Did you ever see Vince Pacifico with</p> <p>13 Sheriff Weaknecht's wife, Jessica Weaknecht?</p> <p>14 A. No.</p> <p>15 Q. Do you know whether Vince Pacifico knew</p> <p>16 Jessica Weaknecht?</p> <p>17 A. I'm not going to confirm that, but I know</p> <p>18 they should know each other.</p> <p>19 Q. And why do you believe that?</p> <p>20 A. Because they were all friends.</p> <p>21 Q. Who all were friends?</p> <p>22 A. Pacifico, the sheriff, they were all</p> <p>23 friends.</p> <p>24 Q. And why do you believe that?</p> <p>25 A. Well, everybody comments about it and</p>	<p style="text-align: right;">Page 252</p> <p>1 targeting Hispanics or treating Hispanics differently</p> <p>2 than Caucasians?</p> <p>3 A. Honestly, I thought about it myself. But</p> <p>4 since I saw the way that they treat each other</p> <p>5 because they were basically friends and the way that</p> <p>6 they behave, like Pacifico talking to him in a way</p> <p>7 only like real close friends talk to each other, I</p> <p>8 thought about it, but I never said anything because</p> <p>9 it was going to be a waste of time.</p> <p>10 Q. Do you know whether anyone told Chief</p> <p>11 DeMore --</p> <p>12 A. No.</p> <p>13 Q. Let me finish asking my question. Do you</p> <p>14 know whether anyone ever told Chief DeMore that Vince</p> <p>15 Pacifico treated Hispanics differently than</p> <p>16 Caucasians?</p> <p>17 A. Not that I know of.</p> <p>18 Q. How about Eric Weaknecht, do you know</p> <p>19 whether anyone ever told Eric Weaknecht that Pacifico</p> <p>20 treated Hispanics differently than Caucasians?</p> <p>21 A. No, not that I know of.</p> <p>22 Q. Did you ever observe Chief DeMore treat</p> <p>23 Hispanics differently than Caucasians?</p> <p>24 A. No.</p> <p>25 Q. How about Sheriff Weaknecht, did you ever</p>

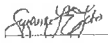
<p style="text-align: right;">Page 253</p> <p>1 observe Sheriff Weaknecht treat Hispanics differently 2 than Caucasians? 3 A. No, I never saw him treating anybody 4 different. Well, he was never there anyway. And we 5 barely, barely saw Chief DeMore unless it's in a roll 6 call or something. We never see him in action, if I 7 could say that. 8 MR. ADAIR: I am going to mark this as 9 an exhibit, 17. 10 (Brewer Exhibit Number 17 was marked 11 for identification.) 12 BY MR. ADAIR: 13 Q. Just for the record, Brewer 17 is a 14 document that your lawyer turned over to us through 15 discovery. Have you had a chance to review that? 16 A. Yeah. 17 Q. I have a couple questions about this. 18 First of all, is this a document that you got from 19 Leslie Cruz? 20 A. Yes. 21 Q. And did you ask her to prepare a document 22 for you? 23 A. No. 24 Q. She prepared this for you? 25 A. He.</p>	<p style="text-align: right;">Page 255</p> <p>1 times to work for the warrant division, that can tell 2 you something of my character of the way that I am. 3 So he wrote that down. 4 He told me that is what I can do for 5 you. I told him, well, I'm not asking you for 6 anything. I'm just letting you know what happened to 7 me. And he told me, if there is anything that I can 8 help you, that I can -- I am going to help you out 9 with. 10 Q. Did Captain Cruz express a belief to you 11 that he thought that Captain DeMore was racist? 12 MR. YARNELL: That Captain DeMore? 13 MR. ADAIR: Correct. 14 A. It was not Captain DeMore. It was Chief 15 DeMore. 16 Q. Chief DeMore, I'm sorry. 17 A. Chief DeMore. Honestly, he never talked 18 to me about Chief DeMore. 19 Q. How about the sheriff, Eric Sheriff 20 Weaknecht, did he ever indicate whether the chief -- 21 that the sheriff was racist? 22 A. I don't remember. I can't say right now, 23 but I don't think he told me anything about the 24 sheriff or DeMore. 25 Q. Did he say whether he believed that Vince</p>
<p style="text-align: right;">Page 254</p> <p>1 Q. Oh, he. I'm sorry. 2 A. Captain Leslie Cruz. 3 Q. He prepared -- let me rephrase that. 4 Do you know whether Captain Cruz was a 5 witness to the incident in the District Attorney's 6 office? 7 A. No, he wasn't. 8 Q. Do you know whether Captain Cruz knew 9 Wendy Bundens or Bobbi Green from the District 10 Attorney's office? 11 A. I don't know if he know it or not, I 12 don't know. 13 Q. How did you find out about the incident? 14 A. Well, I let him know that I got fired. 15 And he just told me, you know that I cannot help you 16 with anything; I'm not going to be able to testify to 17 anything. I know. I'm just letting you know what 18 happened to me. 19 And he told me, I am going to write a 20 letter of my -- I am going to write something to 21 describe what I think about you. And even I don't 22 care who say who or whatever. I don't believe that 23 you leave a prisoner by himself. I don't believe in 24 that. The way he been seeing me working and all 25 that, he ask me like -- I don't know like he says two</p>	<p style="text-align: right;">Page 256</p> <p>1 Pacifico was a racist? 2 A. Yes. 3 Q. What did he say? 4 A. He told me that he didn't know him 5 personally, but he hear a lot of rumors the way that 6 he is and the way he treat Hispanics even when he was 7 a police officer stopping people over just for the 8 race. That's what he told me. 9 Q. When Pacifico was a police officer? 10 A. Yes. 11 Q. Was Captain Cruz retired at the time the 12 incident in the District Attorney's office occurred? 13 A. Right now there are so many dates in my 14 head, I don't remember. I believe he was already 15 retired when that incident happened. 16 MR. ADAIR: I have another exhibit 17 that I am going to mark. I will tell you right now 18 that this is a document that your attorney turned 19 over, and I don't know what it is. And I am going to 20 ask you what it is because I don't know what it is. 21 (Brewer Exhibit Number 18 was marked 22 for identification.) 23 BY MR. ADAIR: 24 Q. This is a document that your lawyer 25 turned over through discovery. Do you know what this</p>

<p style="text-align: right;">Page 257</p> <p>1 is?</p> <p>2 A. It's an EEO seminar, rights and</p> <p>3 responsibilities.</p> <p>4 Q. Is this from a seminar that you attended?</p> <p>5 A. No.</p> <p>6 Q. Is this something that you received while</p> <p>7 you were employed by Berks County?</p> <p>8 A. I don't remember.</p> <p>9 Q. Is this a document that you gave to your</p> <p>10 lawyer?</p> <p>11 A. I gave him a lot of paperwork, but it</p> <p>12 could be. I don't know. I'm not sure.</p> <p>13 Q. Do you have any idea where this came</p> <p>14 from?</p> <p>15 A. I don't remember. There's so many</p> <p>16 paperwork and maybe I did. I don't know. With a</p> <p>17 whole bunch of paperwork that I gave him, it could be</p> <p>18 part of it. Right now, I don't recall.</p> <p>19 MR. YARNELL: Can I state something</p> <p>20 for the record just so this is clear?</p> <p>21 MR. ADAIR: Sure.</p> <p>22 MR. YARNELL: This document was</p> <p>23 provided to me by Mr. Brewer. At the time that it</p> <p>24 was provided to me it was not clear to me whether it</p> <p>25 was something that he obtained while working at the</p>	<p style="text-align: right;">Page 259</p> <p>1 when you got this.</p> <p>2 A. I don't remember the exact date, but I</p> <p>3 got it for that. Now that I remember to organize --</p> <p>4 Q. I'm trying to find out the general</p> <p>5 timeframe. Was this something that you were using to</p> <p>6 organize your life while you were employed by Berks</p> <p>7 County?</p> <p>8 A. Yes, I believe so.</p> <p>9 Q. Okay. Did you ever apply to any colleges</p> <p>10 while you were employed by Berks County?</p> <p>11 A. No, because I was trying things. I'm a</p> <p>12 father of two kids. I got a set of priorities first</p> <p>13 before thinking of myself. I was trying to get a</p> <p>14 bigger house. I was trying to settle everything so</p> <p>15 that I can have piece of mind, in the meantime I go</p> <p>16 to college. That's why it took me a little while for</p> <p>17 me to start it up because I got a lot of priorities</p> <p>18 in my life, my family, my kids that I got to do. I</p> <p>19 got to put everything on their plates and then</p> <p>20 thinking about me going to college and keep improving</p> <p>21 myself.</p> <p>22 Q. While you were employed by Berks County,</p> <p>23 did you ever seek any medical treatment as a result</p> <p>24 of feeling that there was a hostile environment</p> <p>25 towards Hispanics?</p>
<p style="text-align: right;">Page 258</p> <p>1 sheriff's department or while working for the</p> <p>2 Baltimore City Police Department. It was a document</p> <p>3 related to civil rights claims.</p> <p>4 MR. ADAIR: Okay.</p> <p>5 A. It's like I say, I don't remember there</p> <p>6 is so many paperwork.</p> <p>7 Q. That's fine. We will put that aside.</p> <p>8 MR. ADAIR: I am going to ask you the</p> <p>9 same thing about this one, which we will mark as 19.</p> <p>10 (Brewer Exhibit Number 19 was marked</p> <p>11 for identification.)</p> <p>12 BY MR. ADAIR:</p> <p>13 Q. My question again, this is a document</p> <p>14 your attorney turned over to us. Do you know what</p> <p>15 this is or where it came from? Maybe it got confused</p> <p>16 with the paperwork I gave him, but that was like a</p> <p>17 goal setting outline that I was doing for myself to</p> <p>18 finish my college degree and go forward with my life</p> <p>19 and try to organize my life in a new place after I</p> <p>20 get everything settled down.</p> <p>21 Q. This was something of yours from your</p> <p>22 time before you were employed by Berks County?</p> <p>23 A. I don't think it got anything to do, but</p> <p>24 I was trying to get my life organized with this.</p> <p>25 MR. YARNELL: He is trying to ask you</p>	<p style="text-align: right;">Page 260</p> <p>1 MR. YARNELL: I think that has been</p> <p>2 asked and answered in part because he did go to see</p> <p>3 the one doctor who prescribed antidepressants.</p> <p>4 MR. ADAIR: While he was employed by</p> <p>5 Berks County? I don't recall him testifying to that.</p> <p>6 MR. YARNELL: You are correct. He saw</p> <p>7 a doctor after leaving there.</p> <p>8 THE WITNESS: Yes, it was after.</p> <p>9 BY MR. ADAIR:</p> <p>10 Q. While you were employed -- well --</p> <p>11 A. While I was employed there, I had a lot</p> <p>12 of acid reflux. I don't know if you like -- I don't</p> <p>13 remember how that called.</p> <p>14 MR. YARNELL: Acid reflux is what it</p> <p>15 is called.</p> <p>16 A. Acid reflux that is the reason I miss a</p> <p>17 few days of work, not a few -- a consider amount of</p> <p>18 work because I was always throwing up. And basically</p> <p>19 right before I got fired since I was really nervous,</p> <p>20 I was always throwing up.</p> <p>21 Even the day I got fired, I was so</p> <p>22 nervous that I throw up in front of Chief DeMore and</p> <p>23 the other sergeant's name that I don't remember. And</p> <p>24 I got so nervous because the sergeant was having --</p> <p>25 have his hand on the weapon thinking that I was going</p>

10 (Pages 257 - 260)

<p style="text-align: right;">Page 261</p> <p>1 to do something and everybody know I'm not a violent 2 person. 3 I turned over my magazines to let him 4 know that I am not going to do anything. I didn't 5 even have my weapon on me. The way I see they 6 treated me, I was really nervous and I was throwing 7 up that day. 8 Q. Did you actually throw up in front of -- 9 A. Yes, I did. 10 Q. -- those individuals? 11 A. Yes. I got a bucket of garbage because I 12 didn't have enough time to go to the bathroom or 13 anything, and I basically throw up. 14 Q. You would agree with me though that this 15 condition started before Vince Pacifico was ever a 16 sergeant with Berks County, correct? 17 MR. YARNELL: Throwing up when he was 18 fired? 19 MR. ADAIR: No, his condition, 20 throwing up and the acid reflux. 21 MR. YARNELL: The acid reflux. 22 A. Yeah, I could say that, yes. 23 MR. ADAIR: We will mark this exhibit. 24 (Brewer Exhibit Number 20 was marked 25 for identification.)</p>	<p style="text-align: right;">Page 263</p> <p>1 A. No, I don't think so. I don't think I 2 have other doctor. 3 Q. Okay. You described a minute ago having 4 acid reflux. And if you look at page 2 of this 5 document, question 4 at the bottom says describe any 6 other relevant medical facts, if any, related to the 7 condition for which employee seeks leave. Such 8 medical facts may include symptoms, diagnosis or any 9 regimen of continuing treatment such as the use of 10 specialized equipment. And written in there is 11 severe abdominal pain, throat pain, nausea, vomiting, 12 burning and bowel issues. 13 Are those the conditions that you were 14 talking about that were bothering you when you worked 15 at Berks County, the medical condition? 16 A. Yeah, that was part of it. 17 Q. And I asked you whether those conditions 18 started prior to Vince Pacifico becoming a sergeant. 19 And I believe you indicated that you -- that it may 20 have. I'm not trying to put words in your mouth. 21 MR. YARNELL: Do you know? 22 A. Even though I can't see a date right 23 here, I don't remember. I know they started as soon 24 as I leave Baltimore and I come over. I don't know 25 for a fact that it started up when I was working at</p>
<p style="text-align: right;">Page 262</p> <p>1 (Discussion held off the record.) 2 BY MR. ADAIR: 3 Q. Mr. Brewer, I'm showing you what was just 4 marked as Brewer 20; and I will represent to you that 5 this is a document that we turned over both to the 6 Pennsylvania Human Relations Commission and also to 7 your attorney. And this is part -- this is something 8 that is contained in the -- in your personnel file 9 from Berks County, was an application for certain 10 services when you worked there. 11 Let me ask you, was Dr. Hassel one of 12 your treating doctors? 13 A. That's actually my first doctor when I 14 came to Berks County. 15 Q. Did you have any other primary care 16 doctors from the time that you came to Berks County 17 to the present other than Dr. Minnich? 18 A. He was the first, Jeffrey Hassel. He was 19 first. And then when I lose my job and I didn't have 20 insurance anymore and I had to apply for public 21 assistance and I went back there for some reason, I 22 don't know, I didn't feel comfortable. And then I 23 went somewhere else where I met Dr. Minnich. 24 Q. Other than Dr. Hassel and Dr. Minnich, 25 have you had any other doctors?</p>	<p style="text-align: right;">Page 264</p> <p>1 Berks County, but I couldn't tell you a date when 2 they started. 3 Q. I was going to say if you look on page 2 4 there, it says, number 1, approximate date the 5 condition commenced. And it has April 28th, 2009. 6 A. Um-hum. 7 Q. Does that refresh your recollection or 8 does that sound like when that condition began for 9 you? 10 A. Yes, definitely. 11 Q. And is that something that you still 12 experience today? 13 A. No, not like before because I got a 14 treatment for that. I got some pills. I got pills 15 for that and some home remedies back from the Old 16 Country that makes me -- a whole combine of different 17 stuff that make me feel better. But that was -- I 18 don't recall exact dates and all that. 19 Q. Do you currently have a doctor? 20 A. Right now? 21 Q. Yes. 22 A. No. 23 Q. When was the last time you went to a 24 doctor? 25 A. The last time I see a doctor was</p>

<p style="text-align: right;">Page 265</p> <p>1 Dr. Minnich and that was over a year ago. And I'm 2 trying to get another doctor. I'm trying to make an 3 appointment. But since I work so many hours, it's 4 really, really hard for me to make an appointment. 5 Like right now today, I'm losing a day, a payday; and 6 I wouldn't get it back. That's why it's been a 7 little bit hectic for me to do an appointment. 8 Q. While you were working for Berks 9 County -- during the period you were working for 10 Berks County, did you ever seek any psychological or 11 psychiatric care? 12 A. I didn't went that far, but I talk to the 13 chaplain. 14 Q. What's the name of the chaplain that you 15 spoke with? 16 A. Brian Boyer. 17 Q. And where is Brian Boyer a chaplain? 18 A. In the sheriff department. 19 Q. And what did you speak to Brian Boyer 20 about? 21 A. Honestly, I specifically don't remember 22 right now. 23 Q. Did you ever tell him that you believed 24 you were being treated differently because you were 25 Hispanic?</p>	<p style="text-align: right;">Page 267</p> <p>1 why you doing that. 2 Q. My question is a different one. While 3 you were employed by the Berks County Sheriff's 4 Department, did you ever say to your dad, dad, you 5 were right; I'm being treated differently because I'm 6 Hispanic while I'm here? 7 A. Yes, I believe so. I told him that. 8 Actually, right at the time that I was getting 9 fired -- that I got fired, I mention that to him, but 10 I didn't want to tell him that he was right about 11 what he told me because I hate to say this, but he is 12 always right. 13 Q. So you didn't mention it to him until 14 right about the time you were being fired? 15 A. Yep. Almost when I was getting fired I 16 told him that. And I told him about Pacifico. I 17 told him, there is a guy like this, this, this. And 18 he told me, didn't I tell you that; didn't I tell 19 you. You want me to tell you the exact words he use? 20 Q. Yeah. 21 A. Didn't I tell you long ago don't go to 22 that fuckin' state? Didn't I tell you that? 23 Q. Why didn't you tell him earlier that you 24 thought you were being treated differently because 25 you are Hispanic?</p>
<p style="text-align: right;">Page 266</p> <p>1 A. I don't remember the conversation to be 2 honest with you. I don't remember if I told him 3 about that or not or -- I know I talk to him a few 4 times, but right now for some reason I don't recall. 5 I wish I would to give you all the details. 6 Q. While you were still employed by the 7 Berks County Sheriff Department, did you ever tell 8 your sister that you thought you were being treated 9 differently because you were Hispanic? 10 A. No. I didn't talk to my sister about 11 that. I talk to my father about that because he told 12 me 1,000 times when I was a police officer in 13 Baltimore, do not go to Pennsylvania. This is the -- 14 one of the racist state in the United States, don't 15 go there. Stay in Baltimore. You will have a 16 relevant career. And I know for a fact that you will 17 be a hell of a police officer there. Don't go to 18 Pennsylvania. He told me that a thousand time. 19 That's the reason I could not talk to him when I got 20 fired because he was right. He was right about that. 21 Q. But you talked to him when you were still 22 employed by the sheriff's department? 23 A. No. I talk to him even before that when 24 I was a police officer in Baltimore; and I let him 25 know that I was going to move over. And he told me,</p>	<p style="text-align: right;">Page 268</p> <p>1 A. Because I didn't want to let him know 2 that he was right. I'm telling you personal things 3 that I don't want to talk about it because I don't 4 want to bring my father into this problem. 5 Q. Did you -- from the time you started 6 working at Berks County until the present, did you 7 ever keep a journal or a diary? 8 A. No. 9 Q. How about a calendar? 10 A. No. 11 Q. Did your belief that you were being 12 treated differently because you are Hispanic, did 13 that impair your ability to do your job as a sheriff 14 while you were employed by Berks County? 15 A. Honestly, he change my mind a lot. He 16 make me even think about if I am doing the right 17 thing about being a law enforcement officer 18 sometimes. 19 Q. But did it impact how you actually did 20 your job on a day-to-day basis? 21 A. Probably did. 22 Q. How? 23 A. Not concentrating the way that I was 24 supposed to. 25 Q. Explain to me what you mean by that.</p>

<p style="text-align: right;">Page 269</p> <p>1 A. Probably the mistake that I -- mistakes 2 that I did, not reporting that I was being harassed, 3 not thinking the right way and a few other things. 4 Q. So because you were being -- because you 5 perceived yourself as being treated differently, it 6 impacted your thinking and resulted in you not 7 reporting discrimination against you? 8 A. That could be it, yes. 9 Q. Well, not could be. 10 MR. YARNELL: Don't guess. Say yes or 11 no. 12 A. Yes. Yes. Yes. Yes. 13 Q. That's the reason you didn't report -- 14 A. I was feeling afraid of it because I seen 15 so many friendly relations between the supervisors 16 and all that that I didn't know who to trust at that 17 time. 18 Q. What about your former supervisors that 19 you get along with well? 20 A. No. I got along with basically everybody 21 except with Pacifico. But still, I didn't -- that's 22 the way I feel at that time. 23 Q. Give me a minute. I may be done. 24 MR. ADAIR: I don't have any other 25 questions. I don't know if you have any follow-up or</p>	<p style="text-align: right;">Page 271</p> <p>1 2 3 4 June, 17 2015 5 6 7 I hereby certify that the 8 evidence and proceedings are contained fully and 9 accurately in the notes taken by me of the testimony 10 of the within witness who was duly sworn by me, and 11 that this is a correct transcript of the same. 12 13 14  15 16 Suzanne L. E. Toto 17 Registered Professional Reporter 18 19 20 The foregoing certification does not apply to any 21 reproduction of the same by any means unless under 22 the direct control and/or supervision of the 23 certifying reporter. 24 25</p>
<p style="text-align: right;">Page 270</p> <p>1 anything? 2 MR. YARNELL: No. 3 (Deposition concluded.) 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	